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# State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.  
Commissioner

APR 02 1997

Richard L. Caspe, Director  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency, Region II  
290 Broadway  
New York, New York 10007-1866

Re: Removal Request - Cornell Dubilier Electronics Inc.  
333 Hamilton Boulevard  
South Plainfield, Middlesex County

Dear Director Caspe:

The New Jersey Department of Environmental Protection (Department) hereby submits the Cornell Dubilier Electronics Inc. site ("site") for CERCLA removal action consideration. The following information details the case history and supports the removal request.

The site is located at 333 Hamilton Boulevard in South Plainfield Borough, Middlesex County. It is approximately 25 acres in size and is bordered to the north, west and south by commercial and residential properties. The area to the east of the site is zoned and utilized entirely for industrial purposes. The site is designated as Block 256, Lot 1 on the municipal tax map of the Borough of South Plainfield. Cornell Dubilier Electronics Inc. (CDE) owned the site from 1956 to 1961. The current property owner is DSC of Newark Enterprises Inc.

CDE produced capacitors and tested transformer oils at the site until 1961 when the company vacated the site. Currently, the site is occupied by the Hamilton Industrial Park which consists of approximately 15 small industries.

During the years CDE operated from the site it has been alleged that the company dumped transformer oil contaminated with polychlorinated biphenyls (PCBs) directly onto soil at the site. Also, information obtained by the Department's Responsible Party Investigation Unit indicates that waste generated by CDE operations (i.e. spent filter material from the PCB recovery system, residue from trichloroethylene recycling units, capacitors etc.) were landfilled at the site.

On September 11, 1986 Department personnel conducted a Site Inspection and collected soil, surface water and sediment samples. Several metals, volatile organic compounds (VOC) and PCB contamination was detected in the soil. PCB contamination was also detected in sediment samples.

On February 13, 1992 the Department issued a Directive to CDE to 1) determine if the discharges of hazardous substances has contaminated the ground water at the site, 2) if the ground water has been contaminated, determine if the contamination is leaving the site, 3) remediate all sources of the contamination and 4) if the contamination has migrated off site, to institute measures to prevent contamination from migrating any further off site.

On June 19, 1992 the case was transferred to the Division of Publicly Funded Site Remediation (DPFSR) due to non-compliance by CDE to the directive. The South Plainfield area has been identified as a regional ground water contamination area. DPFSR determined that water lines and point of entry treatment systems (POETS) have been or were being installed under the Spill Fund Program in the area near CDE and thereby no additional actions were taken.

On June 8, 1994, as part of a Site Inspection Prioritization, EPA collected soil, surface water and sediment samples. Sampling results revealed elevated concentrations of semivolatile organic compounds, PCBs, and inorganic constituents in the site soil. Sediment samples were inconclusive due to conflicting analysis results.

On February 26, 1996 EPA resampled the site. PCB contamination was documented in both soil and sediment samples.

In addition, the current property owner, DSC of Newark Enterprises Inc., has submitted several reports to the Department for review under the ISRA program during the period from 1994 to 1996. Department review of the submissions revealed that the reports did not disclose all of the environmental issues, including PCB contamination, associated with the site.

EPA has requested the Department's concurrence to propose the site for NPL listing. In addition, the EPA Removal Action Branch has conducted an assessment to evaluate the threat posed by PCB contaminated soil at the site. The Removal Action Branch is currently working with responsible parties to initiate remedial activities which will stabilize any immediate threats to the environment and the local population.

It should be noted that only soil and sediment samples have been collected at the site and, to date, a ground water investigation has not been conducted. However, based on existing information, the CDE site is a likely contributor to the regional ground water contamination documented in the area.

The Department views the presence of PCB contaminated soil to be a serious direct contact threat to the residents in the immediate area. Also, it appears past site activities are responsible for the regional ground water contamination documented in the area, however, additional ground water data needs to be collected at the site to confirm the link to the off site ground water impact.

As indicated in the above summary of activities, the EPA is already actively involved at the site. This document formally refers the site to EPA for removal action activities.

As such, the Department therefore requests that EPA sample, characterize and dispose of all hazardous substances found at the site in such a way as to safeguard the local population, and perform any necessary investigatory and remedial work at the site as deemed appropriate.

Should your staff require additional information please have them contact Janet M. Smolenski of the Bureau of Field Operations, Case Assignment Section at (609) 292-2943.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert R. Van Fossen". The signature is fluid and cursive, with the first name "Robert" and last name "Fossen" being more prominent than the middle initial "R".

Robert R. Van Fossen  
Assistant Director  
Discharge Response Element

c: Richard Salkie, Branch Chief, Removal Action Branch, EPA  
Bruce Sprague, Branch Chief, Response and Prevention Branch, EPA  
Al Kaczoroski, Bureau Chief, Bureau of Field Operations  
Janet Smolenski, EPA Removal Action Coordinator, Bureau of Field  
Operations - Case Assignment Section